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**UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**  
**SAN FRANCISCO DIVISION**

IN RE: CATHODE RAY TUBE (CRT)  
 ANTITRUST LITIGATION,

Master File No. 3:07-cv-05944-SC

MDL No. 1917

This Documents Relates To:  
 ALL ACTIONS

**DECLARATION OF EMILIO E.  
 VARANINI IN SUPPORT OF THE  
 ADMINISTRATIVE MOTION TO FILE  
 UNDER SEAL**

1. I am a Deputy Attorney General with the California Attorney General's Office and lead counsel for the California Attorney General in the state court case of *State of California et. al. v. Samsung SDI, Co., Ltd.*, Case No. 11-51584 (California Superior Court, San Francisco). This case has been coordinated with this Court's MDL No. 1917 for purposes of fact and expert discovery as well as mediation and settlement. I am admitted to this Court and could, if called as a witness, testify competently to the matters set forth herein. I make this declaration under penalty of perjury under the laws of the United States and the State of California.

1           2.       Portions of the new proposed Letter of Request to Reschedule the  
2 Deposition of Leo Mink (including the Dutch translation of that latter), that is attached to  
3 the Proposed Order Granting the Administrative Motion for Order Issuing Letter of  
4 Request to Reschedule the Deposition of Leo Mink refers to the following information:  
5 (1) confidential documents and interrogatory responses produced pursuant to the  
6 Protective Order applicable in these proceedings and (2) confidential information  
7 received from Defendant Philips pursuant to a settlement agreement that it has with the  
8 Attorney General, including the personal address of a witness the Attorney General seeks  
9 to depose. This confidential information has been submitted in support of a non-  
10 dispositive motion.

11           3.       The references to the contention interrogatories and the document from  
12 Defendant Philips, involve documents provided in the course of discovery in this case  
13 and have been designated as “Confidential” or “Highly Confidential” pursuant to the  
14 Protective Order applicable in this case. The references to confidential information  
15 provided to the Attorney General by Defendant Philips, such as the personal address of  
16 the witness the Attorney General seeks to depose, concern information provided to the  
17 Attorney General pursuant to the settlement agreement entered into between those two  
18 parties.

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1           4.       Only the portion of the Proposed Order containing the Letter of Request  
2 and its Dutch translation has been lodged under seal. The Attorney General believes that  
3 it is not practical for only portions of this Letter of Request to be filed under seal given  
4 the extensive reference to confidential information throughout the entirety of this  
5 document.

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7 Dated: April 2, 2014

Respectfully Submitted,

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9 KAMALA D. HARRIS  
Attorney General of California

10 *s/ Emilio E. Varanini*

11 EMILIO E. VARANINI  
12 Deputy Attorney General  
13 *Attorneys for Plaintiffs*  
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